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Plaintiff in Pro Per

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MARC WOLSTENHOLME,

Plaintiff,

vs.

RIOT GAMES, INC.,

Defendant

CASE NO. 2:25-CV-00053-FMO-BFM

HON. FERNANDO M. OLGUIN

PLAINTIFF'S MOTION IN LIMINE TO
ADMIT EVIDENCE

DATE: FEBRUARY 27, 2025
TIME: 10:00 A.M.
CRTRM: 6D

JANUARY 29, 2025

Dated this: JANUARY 29, 2025

M. WOLSTENHOLME

[MARC WOLSTENHOLME]

COMPARISON OF CHARACTERS FROM ARCANE & BLOODBORG- NEVA, AMBESSA,
AND MEL MEDARDA, WITH REFERENCE TO SAVIOR VIKTOR AND HIS WHITE-
EYED FOLLOWERS.

1. Introduction:

I, Marc Wolstenholme, am the plaintiff in this matter, representing myself pro se.

This declaration is made in support of my PLAINTIFF’S MOTION IN LIMINE TO ADMIT EVIDENCE, to submit additional evidence relevant to my claims against Riot Games, Inc. for copyright infringement, unfair competition, and intentional infliction of emotional distress.

2. Evidence Submitted:

I submit the following evidence of COMPARISON OF CHARACTERS FROM
ARCANE & BLOODBORG- NEVA, AMBESSA, AND MEL MEDARDA,
WITH REFERENCE TO SAVIOR VIKTOR AND HIS WHITE-EYED
FOLLOWERS. This is not an exhaustive list, but serves to demonstrate key
elements of my original work and the substantial similarities between my work
and the infringing material produced by Riot Games, Inc.

3. Comparison of Characters:

This document specifically shows the striking similarities between Neva in Bloodborg, Neva, compared to Ambessa, and Mel Medarda, with reference to savior Viktor and his white-eyed followers. in Arcane and in the Blood Sweat and Tears music video, which is an extended narrative of Arcane.

To demonstrate the similarities and alleged infringements between Bloodborg and Arcane (and its spin-offs), The Plaintiff will structure the analysis to highlight thematic and narrative parallels between Neva (from Bloodborg) and Ambessa Medarda (young Ambessa from the Blood, Sweat, and Tears music video, and her older version from Arcane), as well as other characters such as Mel Medarda. Additionally, The Plaintiff will show that after also visiting the higher consciousness, savior Viktor and his white-eyed followers, including Salo, are infringements of the higher consciousness narrative and the white-eyed children of Gaia storyline. Additionally, the use of these literary functions as a mirror story, is also alleged to have been lifted from Bloodborg. This will establish a case that Arcane borrowed significantly from Bloodborg's worldbuilding, characters, and central themes.

1. Leadership and Power: Neva vs Ambessa Medarda

Neva- Neva leads the future coming of the Chachiwiri Rozwi tribe in a post-apocalyptic world marked by scarcity, war, and survival against human and environmental threats. Her leadership is rooted in strength, maternal care (both symbolic and literal), and her spiritual connection to Mother Gaia. Her fierce resolve is tempered by her grief over her lost daughter Sabella, but this pain fuels her purpose as a protector of her people and the earth. Neva's ability to command loyalty (from her tribe and the genetically bred hyenas) reflects her primal, elemental leadership, deeply intertwined with nature.

1 **Ambessa Medarda-** Young Ambessa Medarda, as depicted in Blood, Sweat, and
2 Tears, mirrors Neva in her commanding presence, her tribal warrior aesthetic, and her dominance
3 over the battlefield. Older Ambessa from Arcane is an imperialist and militaristic leader, with a
4 pragmatic approach to power and dominance. She, like Neva, is a central figure in determining
5 the fate of her people and wields her influence strategically to survive in a hostile, competitive
6 world. Her maternal complexity (in her relationship with Mel) mirrors Neva’s grief over Sabella,
7 showing that even the most powerful women are shaped by loss and the need to secure the
8 survival of their "offspring," whether biological or symbolic.
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11 **2. Maternal Symbolism: Neva, Ambessa, and Mel Medarda**

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14 **Neva and Sabella-** The tragedy of Sabella's “stillbirth” associated with arrows,
15 and Neva's inability to find her aura within Mother Gaia is a poignant exploration of maternal
16 grief and its transformative power. We see the same in young Ambessa in the music video,
17 where she too was shot in the belly with an arrow and, she too visited the higher consciousness
18 realms to search for answers and for her daughter. She too was gifted a “white-eyed child of
19 great importance.” It should be noted that the foreshadowing of the arrow to the belly is kept a
20 secret in Bloodborg to help Neva grieve. It was in fact her rival tribe lover and Sabella’s father
21 who shot her in the belly during a moment of psychosis caused by the illness infecting the world.
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23

24 Neva’s quest to save the world and find the baby boy with white eyes stems from
25 her maternal instincts and her bond with Sabella. The milk that leaks from her swollen breasts
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27

1 becomes a recurring image of her unresolved motherhood, symbolizing life and nurturing even
2 as she endures great personal suffering. There is a major plot twist unrevealed here.

3 Likewise, Riot Games have left much of Mel and Ambessa's backstories vague,
4 or unresolved. Mel's important quest hasn't yet been revealed in the ongoing projects of the
5 newly formed animation and live-action departments of Riot Games. However, it has been
6 shown in the "Welcome to Noxus - Bite Marks" cinematic that Mel continues the storyline of
7 Arcane. She goes on her quest to save the world, or however Riot wishes to mask or subvert it.
8

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10
11 **Ambessa and Mel Medarda-** In Arcane, Ambessa's strained relationship with
12 Mel highlights a form of "broken" motherhood. Ambessa's ruthless approach to power and
13 politics created an estranged, emotionally scarred daughter who rejects her mother's militarism.
14 This complexity resonates with Neva's internal conflict of nurturing versus leading in a brutal
15 world. Furthermore, the allegation that Mel is the white-eyed child in Bloodborg strengthens
16 maternal symbolism, suggesting a deep connection which is far beyond chance.
17

18 In the Bloodborg trilogy, it is planned that Neva is overbearing and violently
19 protective of the white-eyed child (Boy) because she lost a daughter. In Arcane, Ambessa is
20 overbearing and violently protective of her white-eyed child (Mel) partly because she lost a
21 child, Mel's brother Kino Medarda.
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3. Spirituality and Connection to Nature

Neva and Mother Gaia- Neva's relationship with Mother Gaia is central to her identity. As a shamanic figure, she connects to the higher consciousness, searching for answers and strength to protect the earth. Her tribe's rituals and the idea of a chosen saviour born from the Baobab tree reinforce her role as a spiritual leader tied to the earth.

Ambessa and the Medarda Empire-Ambessa's dominion and her militaristic control of resources (mirroring Neva's protection of the tribe's water and food) position her as a figure of natural authority. While she lacks Neva's spiritual connection to nature, Ambessa exerts control over resources, just as Neva ensures the survival of her people through sacred traditions. Ambessa visits the higher consciousness realms to fight for her daughter to survive, somehow making Mel a magical, white-eyed child.

Mel as the White-Eyed Child- Mel is alleged to be the white-eyed child from Bloodborg (symbolizing rebirth and hope for a destroyed world), her estrangement from her mother parallels the broader theme of humans breaking away from nature's protective embrace in Bloodborg.

4. Warrior Iconography and Hyenas vs. War Machines

Neva and Her Hyenas- The genetically engineered hyenas in Bloodborg symbolize loyalty, companionship, and primal power. Each hyena reflects Neva's inner

1 struggles. Malik is fierce, Adisa is cunning, and Lula is nurturing yet untapped. These animals
2 are extensions of Neva's will and embody the Rozwi tribe's symbiosis with nature. In Arcane,
3 the "Wolf" fills the same inter animalistic soul and spiritual guardian role as the Hyenas. Both
4 are cunning and dangerous. Wolves and hyenas are both wild animals with unpredictable
5 behaviors, yet they are also both nurturing, social "Pack" animals. This is the spiritual heart of
6 both Neva and Ambessa, and by extension, their respective, white-eyed children.
7

8
9 **Ambessa and War Machines-** Ambessa's reliance on military power and
10 machines in Arcane mirrors Neva's relationship with her hyenas. Both women use these tools,
11 beasts and machines alike, as instruments to protect and enforce their will. This juxtaposition
12 highlights the shift from nature-based survival in Bloodborg to industrial warfare in Arcane. It's
13 alleged that it's the same story told with a different lick of paint. Neva has three spiritual
14 guardians, represented in arrowhead formation, as does Ambessa. Neva is gifted a white-eyed
15 child of great importance, as is Ambessa. Niva is sent on a quest with the child, to save the
16 world, which is to protect the child, as is Ambessa. Mel is that child, grown up and still
17 following her quest.
18
19

20 21 **5. White-Eyed Figures: Mel, Morgan, and Ambessa.**

22 **White-Eyed Morgan and the Child-** The white-eyed figures in Bloodborg (the
23 stillborn child, Morgan, and the clone) serve as symbols of rebirth, knowledge, and hope. They
24 connect to Mother Gaia's plan for humanity's survival, bridging past destruction and future
25 renewal.
26
27

1 **Mel and Ambessa-** Mel Medarda's golden-hued, almost divine aura in Arcane is
2 often interpreted as her inheriting a "higher purpose" beyond the earthly wars Ambessa fights.
3 Bloodborg's white-eyed child is alleged to have become Arcane's Mel, her estrangement from
4 her mother reflects the lost connection between humanity and nature. It's alleged that Ambessa
5 was created from the warrior women of Bloodborg, and she carries forward the legacy of Neva's
6 maternal strength and warrior spirit, updated for a technological, steampunk aesthetic.
7

8

9 **6. Thematic Overlaps: Dystopia, Survival, and Revolution**

10 Both Bloodborg and Arcane explore dystopian worlds marked by societal
11 collapse, exploitation, and rebellion. Neva and Ambessa are both powerful women navigating
12 fractured societies while balancing personal grief, maternal instincts, and the demands of
13 leadership. The theme of revolution is central to both narratives. Neva's quest to save Mother
14 Gaia mirrors Morgan's uprising in Bloodborg and Ambessa's imperial strategies in Arcane, plus
15 Mel's ongoing quest, which is the white-eyed child's quest in Bloodborg. The borrowed imagery
16 of tribal rituals, nature's saviors, and technologically advanced oppressors creates a clear lineage
17 between the two worlds.
18

19 Additionally, Neva's POV in Bloodborg, is called The African Child. This is a
20 direct reference to the Plaintiff's half Ugandan niece's tragic death in the UK. Like all of
21 Bloodborg and indeed, M.W. Wolf's catalog of fiction, this is trauma writing, which is a
22 hallmark of the central pocket universes of the M.W. Wolf Megaverse of Fiction.
23

24 Indeed, the M.W. Wolf slogan is: *"Dark and gritty adult fiction with grand*
25 *themes of implicitly examining the human condition."*
26

Exhibits

Exhibit A- Extracts from Bloodborg alleged to have been used to build Mel and Ambesssa.

Exhibit A1. Maternal Symbolism and Leadership

Bloodborg – Neva's Milk and Maternal Struggle

BB- "Neva thrust the beasts aside and sat up. She wiped the tears from her face with a cloth-sling which was intended to carry Neva's newborn daughter, Sabella.

BB- 'It's Sabella's milk,' she sighed, her body shrivelling as she spoke."

Arcane – Ambessa and Mel's Relationship

"She was a manipulative, calculating, ruthless, and powerful warlord from Noxus. Ambessa thought of her family as the most important part of her life and was determined to secure her legacy." https://arcane.fandom.com/wiki/Ambessa_Medarda

Infringement Crossover: Both characters' leadership is juxtaposed with their failure as mothers. Neva's milk symbolizes her grief over Sabella's death, just as Ambessa's role in her son's death haunts her relationship with Mel. Both mothers are portrayed as simultaneously nurturing and destructive.

Exhibit A2: Warrior and Tribal Iconography

Bloodborg – Neva’s Ritual Armour

BB- "Neva placed on her ritual headdress, made from the bones of her ancestors and the teeth of lions. Hyena skulls hung on a banner, across her left shoulder.

BB- “Her shield was made from the hide of a Nile Crocodile, a warrior’s rite of passage.”

Blood, Sweat, and Tears Music Video – Ambessa Medarda's Warrior Aesthetic

Ambessa is seen wearing gold-plated armour with tribal patterns, adorned with bone-like decorations on her chest and shoulders. Her design explicitly evokes a powerful warrior matriarch rooted in tribal tradition. She wears the baby carrier sling under her armor, she has similar twin curved blades.

Infringement Crossover: Ambessa’s character design in Blood, Sweat, and Tears mimics Neva’s armour and tribal themes, particularly the use of animal leather, baby sling and animal elements to signify ancestral and natural power and Maternal grief.

1 **Exhibit A3: White-Eyed Savors**

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3 **Bloodborg – The White-Eyed Child and Morgan.**

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5
6 BB- "Inside the trunk was a newborn baby boy, with the same geometric tribal
7 markings as the woman and gleaming, brilliant white eyes."

8
9 BB- "Morgan's right eye was brilliant white." (Morgan as a recurring figure of
10 rebirth and resistance.)
11

12
13 **Arcane – Mel's Divine Aura and Symbolism**

14
15 Mel's white-and-gold aesthetic and almost divine presence in Piltover's political
16 world draw visual parallels to the white-eyed saviour imagery. Her role as a moral counterpoint
17 to her militaristic family echoes Morgan's role as a revolutionary. In the Blood Sweat and Tears
18 Music Video, Mel is brought back to life inside her mother (Ambessa). She opens her beaming
19 white eyes.
20
21

22 **Infringement Crossover:** Both Bloodborg and Arcane position white-eyed
23 characters as figures of destiny, bridging past destruction and future salvation. The child from
24 Bloodborg and Mel's symbolic role overlap significantly in narrative function.
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1 **Exhibit A4: Nature and Connection to the World**

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3 **Bloodborg – Neva and Mother Gaia**

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6 *BB- "Mother Gaia came to me in my sleep. She told me I'd find the boy who could*
7 *save the world. She spoke his name."*

8
9 *BB- "Neva searched the higher consciousness day and night for Sabella's aura.*
10 *'She's not in Gaia,' Neva wailed, 'I've searched everywhere.'"*
11

12
13 **Arcane – Ambessa's Vision of Power and Control**

14 We see this portrayed strikingly similar in young Ambessa, who also visits the
15 higher consciousness and is also gifted a white-eyed child of great importance. We see her
16 connect to the land and nature in the music video and in her spiritual animalism of the wolf.
17

18
19 **Infringement Crossover:** Both Bloodborg and Arcane root their characters in
20 their respective worlds' natural forces. Neva's spiritual connection to Gaia mirrors Ambessa's
21 fatalistic understanding of nature's dominance and both of their visits to the higher
22 consciousness, resulting in the birth of a white-eyed child, in both.
23

1 **Exhibit A2: Ruthless Leadership**

2
3 **Bloodborg – Neva’s Command Over the Elders**

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5
6 *BB- "‘Did you not understand me,’ yelled Neva. ‘Yes, Chieftain, we understand,’*
7 *said both elders bowing."*

8
9 **Arcane – Ambessa’s Command Over Piltover’s Leaders**

10 Ambessa is portrayed as a ruthless, strong leader over her Noxian Army and over
11 Piltover’s leaders and Enforcers.

12
13
14 **Infringement Crossover:** Both Neva and Ambessa exercise ruthless command
15 over their subordinates, employing sharp dialogue to reinforce their authority.

16
17
18 **Exhibit A6: Hyenas vs War Machines and Wolves.**

19
20 **Bloodborg – Neva’s Hyenas**

21
22
23 *BB- "Malik was the pack alpha. ... He was the product of generations of selective*
24 *breeding to produce a loyal guardian of the tribe leader."*

25
26 *BB- "Adisa was a mongrel, bred to be a stealthy assassin of the night."*

Arcane – Ambessa’s War Machines

Ambessa commands her iron fleet with precision, bred from generations of conquest and war. She and Mel are also being shaped or bred to be Wolves of War.

Infringement Crossover: The role of Neva’s hyenas as genetically engineered protectors of the tribe mirrors Ambessa’s reliance on advanced machines and inner animal nurturing to extend her influence. Both serve as extensions of their leaders’ will and animals of war.

Exhibit A6: Dystopian Survival

Bloodborg – The Wastelands and Desperate Resistance.

BB- "Grey walls towered up each side of her and rotting animal carcasses littered the ground. Neva looked out over the wastelands to Chinotimba city, which was mostly desolate. The infected and mutated people inhabited the cities."

Arcane – Zaun and Piltover’s Divide

We see the same, fight for survival in the dynamics of Zaun and Piltover’s Divide but more so in Season 2 when Viktor turns Gaia into a power of tyranny over the world, turning it into a rotting wasteland, which is where Jayce visits in the higher consciousness.

1 **Infringement Crossover:** Both narratives centre on survival in dystopian
2 environments. The wastelands in Bloodborg and Zaun in Arcane serve as settings where
3 corruption and resource scarcity fuel conflict.
4

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6 **Exhibit A8: Rituals and War Preparation**
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8 **Bloodborg – Neva’s Dance of the Warriors**
9

10 BB- "The warriors danced around the village fire... Neva looked out across the
11 orange horizon, imagining the epoch of giraffes and elephants. She called for two warriors to
12 accompany her to Kariba."
13
14

15 **Arcane – young Ambessa’s Rituals and War Preparation**
16

17 The whole of the Blood Sweat and Tears music video is the same “Dance of the
18 Warriors” ritual, from the vultures to the standing dead trees and the drums, to the three hyenas,
19 the same eye of the cave, the semi-hallucinations inside the higher spiritual realms, the same
20 three spiritual guardians, the same arrowhead formation symbolism and foreshadowing, and of
21 course the birth of a white-eyed child at the end of the ritual.
22
23

24 **Infringement Crossover:** Both Neva and Ambessa utilise rituals (literal or
25 symbolic) to rally warriors before embarking on missions critical to their people’s survival. Both
26 use their rituals to connect to the higher spiritual realms, and three spiritual guardians.
27
28

Exhibit A9: Ambessa's Lineage Borrowed from Neva.

Bloodborg – Sabella's Death and Rebirth Symbolism

"‘She's not up there. Sabella isn't inside Mother Gaia, I've searched the higher consciousness for her aura.’"

Arcane – Mel's Rebirth and Hope for the Future.

Mel is positioned as a symbol of Piltover's potential redemption and the new generation, mirroring how Neva sees Sabella's potential reincarnation in the white-eyed child.

Infringement Crossover: Both Neva's and Ambessa's stories use maternal grief and a white-eyed child's rebirth to explore hope amidst destruction.

A10- Conclusion

The thematic, symbolic, and narrative overlaps between Bloodborg and Arcane are too significant to dismiss as coincidence. From maternal grief and white-eyed saviours to dystopian survival and tribal warrior aesthetics, Arcane appears to have drawn directly from Bloodborg to shape characters like Ambessa, Mel, Viktor, Salo, and many more outside of the comparison of this document. Each exhibit above highlights potential infringement, making a compelling case for Bloodborg's influence on Arcane.

Exhibit B- Viktor savior and his white-eyed followers.

Please Note, Viktor is also going to have his own transformation evidence document.

Comparison of Narrative Infringement: Higher Consciousness, White-Eyed
Saviours, and Mirror Story, from Viktor's mirror narrative.

B1. Higher Consciousness and Spiritual Themes

Bloodborg – Higher Consciousness Narrative:

*BB- "Neva searched the higher consciousness day and night for Sabella's aura.
'She's not in Gaia,' Neva wailed, 'I've searched everywhere.'"*

*BB- "'Mother Gaia came to me in my sleep. She told me that the eyes of white
hold the power of Gaia. She instructed me to save the boy who could save the world.'"*

In Bloodborg, Neva's connection to Mother Gaia and her ability to access the
higher consciousness becomes a core element of the story. The higher consciousness is depicted
as a realm where lost souls and energies can reside, holding spiritual significance for Neva's
journey to find her daughter's aura and fulfil her destiny.

In other Bloodborg POV's, such as Josh and Warwick's POV's, we see that the
Ark and Assemblage has been able to access and hijack the higher consciousness by using in-

1 brains quantum computers, called Vada In-brain and Deep-Root. The latter, Deep-Root, can also
2 be accessed via a natural root drug, or root potion, which both Neva and Josh have used.
3

4
5 **Arcane – Viktor’s Connection to the Unknown:**

6
7 Viktor's storyline explores his relationship with the mysterious energy in the
8 Hexcore, which embodies a similar metaphysical connection. His pursuit of this energy and its
9 transformative effects mirrors the spiritual journey of higher consciousness in Bloodborg. Viktor
10 visits the higher consciousness and hijacks the higher energy, becoming a Jesus like savior. With
11 his new powers, he hijacks and controls the minds of his followers, turning them into White-
12 eyed followers in the same way as Vada In-brain does to it’s connected subjects.
13
14

15 **Arcane Quote:** "In the pursuit of great, we failed to do good. We have to make it
16 right." – Viktor reflecting on the unintended consequences of his bond with the Hexcore.
17
18

19 **Infringement Allegation:** The Arcane narrative takes the concept of a higher
20 plane of existence—where salvation, purpose, or resolution can be achieved, and ties it to
21 Viktor’s journey. His exploration of this “higher energy” parallels Neva’s, Josh’s and other,
22 explorations of the higher consciousness in Bloodborg, with this feature in both stories both
23 serving as moral and narrative keystones.
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B2. White-Eyed Saviours and the Children of Gaia

Bloodborg – The White-Eyed Child of Gaia and Morgan.

BB- "Inside the trunk was a newborn baby boy, with the same geometric tribal markings as the woman and gleaming, brilliant white eyes."

In Bloodborg, the white-eyed children of Gaia represent rebirth, hope, and the chosen saviours of humanity. This motif is extended through Morgan, whose white eyes symbolizes his revolutionary role and connection to Gaia's divine plan.

Arcane – Viktor's White-Eyed Followers (Including Salo):

The inclusion of white-eyed characters tied to Viktor's Hexcore experiments and journey to the higher consciousness, particularly Salo and other test subjects, strongly mirrors the Bloodborg narrative. Viktor is presented as a saviour figure whose followers embody a new vision of humanity, one that is biologically and spiritually altered. Viktor addresses the broader implications of his work, but still pushes ahead like a spiritual tyrant, controlling the minds of his perfect army, which is remarkably similar to the Ark in Bloodborg.

1 **Infringement Allegation:** Arcane uses the white-eyed savior narrative from
2 Bloodborg, in Viktor and his followers, echoing Bloodborg’s symbolic white-eyed children of
3 Gaia. Both works present these figures as representations of human evolution and divine
4 intervention.
5

6 7 **B3. Mirror Story Function and Literary Parallels**

8 9 **Bloodborg – The Mirror Story:**

10 The higher consciousness functions as a narrative mirror in Bloodborg, reflecting
11 Neva’s internal struggles and external mission. Her search for Sabella’s aura and the introduction
12 of the white-eyed child creates dual narratives: one of personal loss and one of collective
13 salvation. Additionally, as evidenced in several court documents, parallel storytelling and mirror
14 arks are a central feature of Bloodborg’s literary design. We see this in Neva and Morgan, Gaia
15 and Vada in-brain, Cowboy and The High Commander, falling, Coma and drowning motifs and
16 so much more, which, we also see time and time again in Arcane, presented in almost the same
17 way, over and over, with a little masking and a lick of paint.
18
19

20 21 **Arcane – Viktor’s Story as a Mirror:**

22 Viktor’s journey serves as a narrative mirror, reflecting Zaun’s broader struggles
23 and Piltover’s ignorance of its consequences. The transformation of Viktor and his followers
24 highlights the cost of progress, and the moral sacrifices needed to achieve salvation. Viktor is a
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1 mirror of Mel, in that he has also accessed the higher power but in a different way. In a forced
2 and hijacked way.

3 **Arcane Scene:** Viktor's experimentations with Salo and his ultimate realization
4 of their consequences mirror the duality in Bloodborg: personal ambition vs. greater good.
5

6
7 **Infringement Allegation:** Both works use their saviour narratives as mirrors to
8 explore themes of sacrifice, transformation, and the cost of salvation. The literary function of
9 these stories, particularly in how they parallel internal and external conflicts, suggests narrative
10 borrowing.
11

12 13 **B4. Contextual Overlap**

14 **Bloodborg-** Neva's connection to Gaia's consciousness and her role as the
15 protector of the white-eyed child creates a story rooted in spiritual transformation and ecological
16 salvation.
17

18 **Arcane-** Viktor's transformation, his connection to an otherworldly energy, and
19 his white-eyed followers borrow these same narrative functions to explore themes of scientific
20 evolution and societal progress at the expense of the earth's health.
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B5- Conclusion

The Plaintiff will demonstrate that the following elements of Arcane and its spin-offs were directly lifted from Bloodborg:

- i. The higher consciousness narrative, explored through Viktor's connection to the Hexcore, mirrors Neva's spiritual journey in the higher consciousness of Gaia.
- ii. The white-eyed children of Gaia, symbolising rebirth and salvation, are repurposed in Viktor's white-eyed followers like Salo, transforming their meaning into a scientific saviour archetype. This hijacking is also alleged to have been taken from Vada In-Brain.
- iii. The mirror story—a literary function that reflects personal sacrifice and societal transformation—is employed in both works, suggesting clear thematic borrowing.
- iv. These infringements point to a systemic lifting of literary elements, reinterpreted but not transformed enough to constitute original work in Arcane.

Exhibit C- Blood, Sweat & Tears" | Music Video

C1. Purple or Blue people, no eyes.

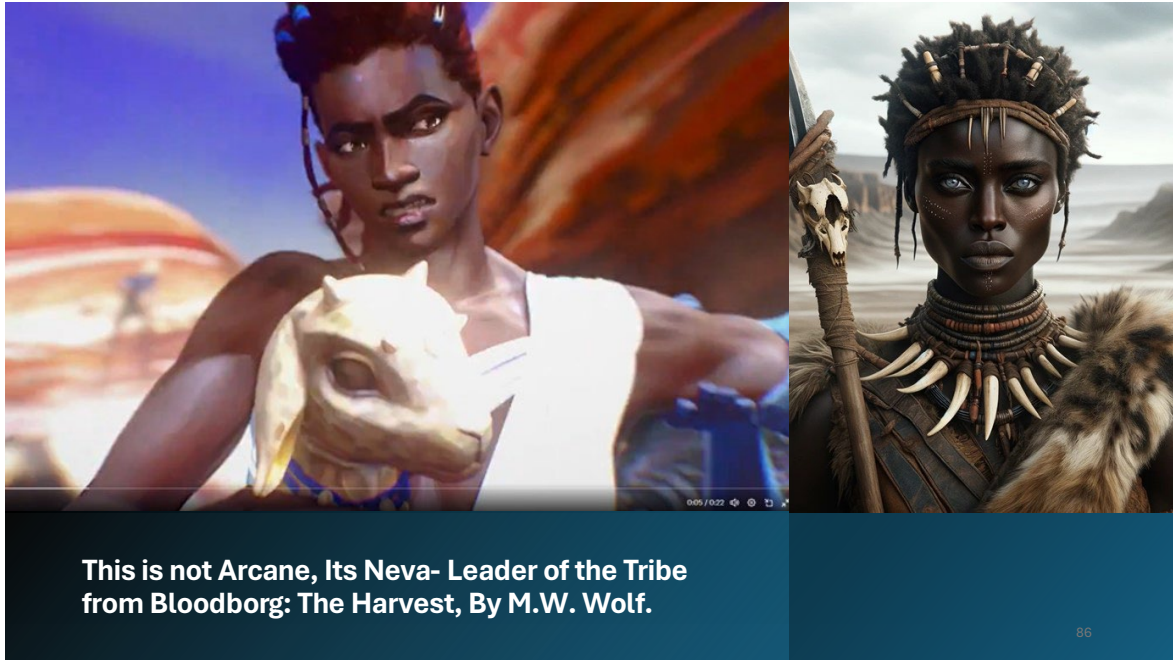


In Bloodborg,

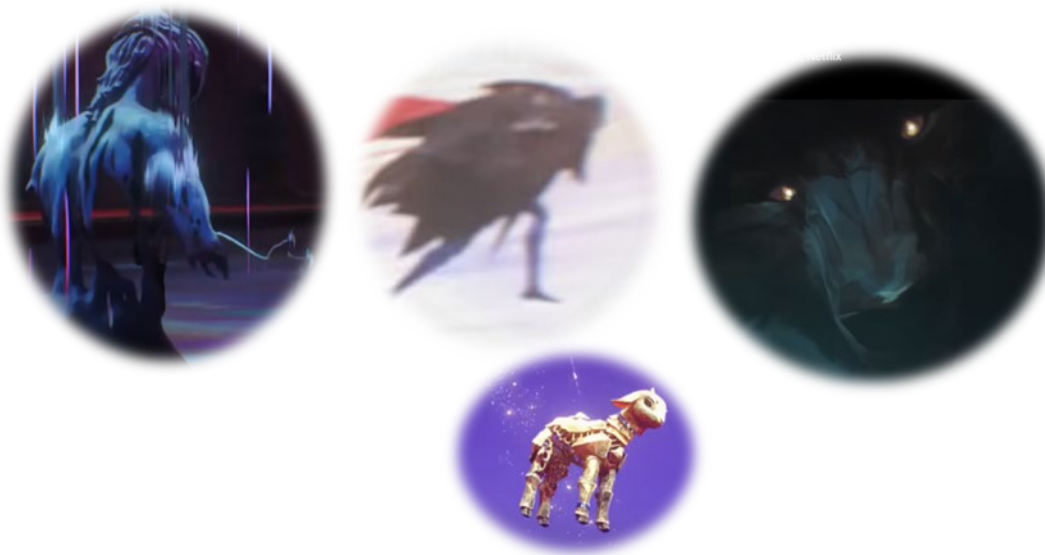
BB- "...stayed well clear of Chinotimba and the other cities. The infected and mutated people inhabited the cities. The biochemical creatures spread diseases and death in those places."

BB- "Some even hunted Rozwi people for their eyes, believing that by swallowing the eyeballs of Rozwi purebred, they would gain vitality and be saved in the afterlife by the power of the worlds inside the eyeballs."

C2- Visual Similarities



C3- Semi-psychedelic dreamlike sequence.



1 **In Bloodborg: The Harvest by M.W. Wolf**, the semi-psychedelic dream-like
2 sequence is Neva in a drug-induced sleep realm searching the higher consciousness for her
3 daughter Sabella.
4

5
6 **In Bloodborg:** *“She’s not up there, Sabella isn’t inside Mother Gaia, I’ve*
7 *searched the higher consciousness day and night for two weeks. I’ve searched everywhere for*
8 *her.’*

9 *‘Perhaps she isn’t ready to be contacted.’*
10

11
12 *‘Or perhaps she is reborn inside of some great animal, a bird or perhaps inside*
13 *Lula.’”*
14

C4- Vultures



Bloodborg, African child: Ritual Dance

Vultures

BB- “The horizon warmed with orange and red, As Neva was greeted at the village gates by two lines of warriors. An Elder held out a sharp down-pointing beak of a vulture. Neva pressed the point of the beak into the exposed chest of the warriors she had selected to dance for her.

As the warrior’s danced around the village fire, Neva looked out across the rich orange horizon and imagined what it would have been like in the epoch of giraffes and elephants. Skeletons of trees pierced the dead earth, and human bones littered the land, reminding Neva that Mother Gaia was approaching her end- stage.”

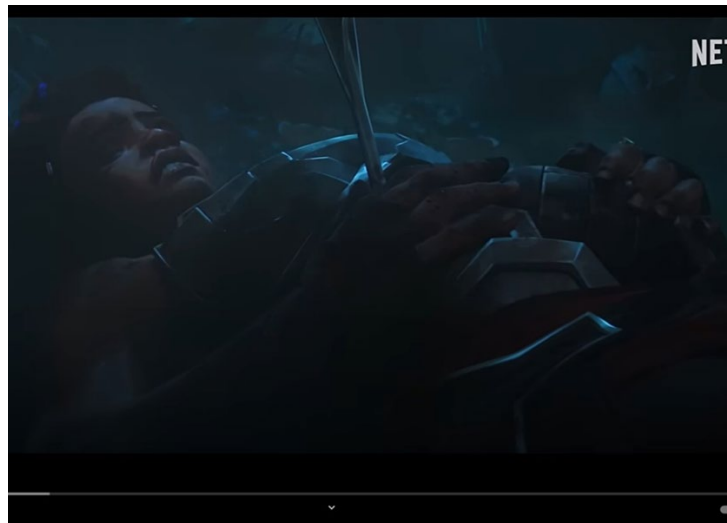
C5- Arrowhead Formation (Foreshadowing/ red herring).

In Bloodborg: Neva also lost a child. I used foreshadowing to hint to the readers what happened. Interestingly, the reveal was cut from the original draft to keep it mysterious in book one.

BB- “Three hyenas licked Neva’s exposed swollen breasts as milk leaked from them. Neva thrust the beasts aside and sat up. She wiped the tears from her face with a cloth-sling which was intended to carry Neva’s new-born daughter, Sabella.”

BB- “Neva wiped the hyena drool from her breasts and stood up, prepared to receive her tribesman. Neva whistled and the three Hyena’s sprang to attention. The hyenas guarded Neva in arrowhead formation”

Arcane: Young Ambessa Pregnant and shot in the belly, losing a child, saved by higher consciousness.



C6- Visual Design features.

Bloodborg-

BB- “Hyena Skulls hung on a banner, across her left shoulder.”

BB- “Under is a “cloth-sling, which was intended to carry Neva’s new-born daughter, Sabella.”

BB- “On her back she strapped her double-end steel blade.”



C7- Beastly Silhouettes

Bloodborg-

BB- “Heat radiated up from the ground, wobbling Neva’s image of the two barefooted silhouettes which approached up the riverbed, the earth cracked with each footfall.”

BB- “Three hyenas licked Neva’s exposed swollen breasts as milk leaked from them. Neva thrust the beasts aside and sat up. She wiped the tears from her face with a cloth-sling which was intended to carry Neva’s new-born daughter, Sabella.”

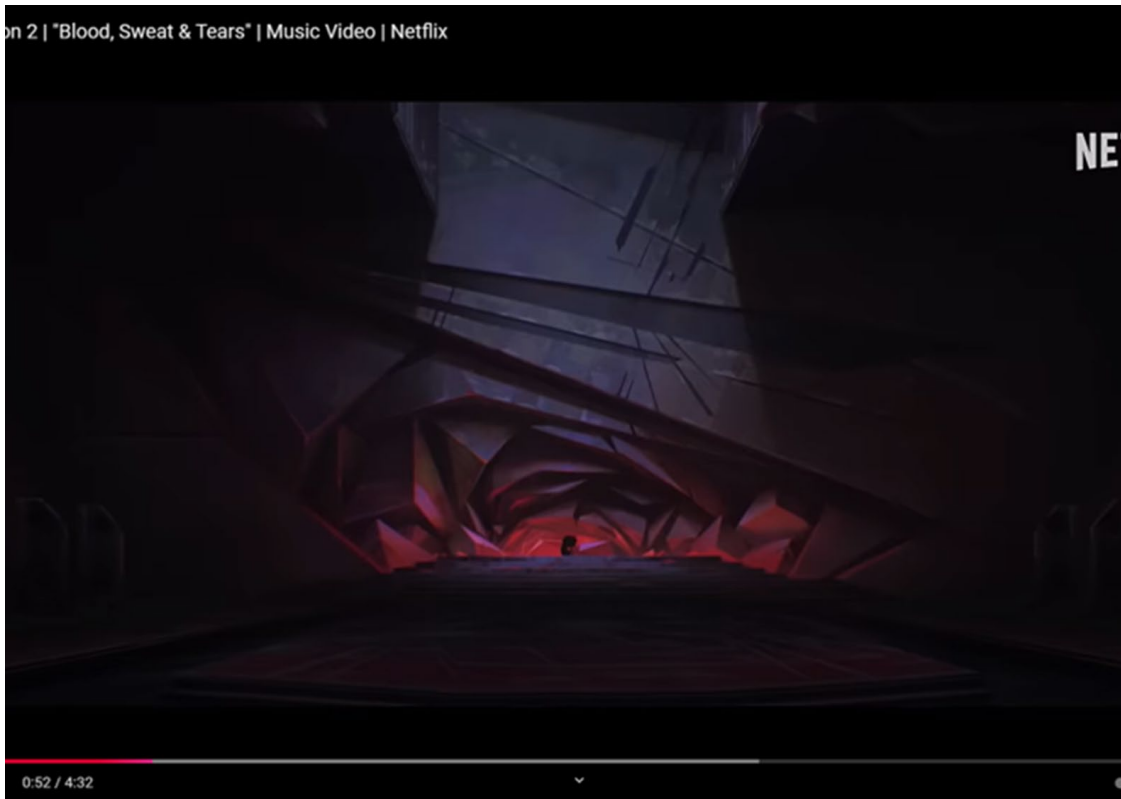


C8- The eye of the Cave!

Bloodborg-

BB- *“Neva lay in the dusty earth, in the mouth of her cave dwelling which burrowed into a dry wall of a gorge close to where the once great attraction stood.*

BB- *“The blazing sun shone into her blue-grey eyes. Like a cosmic explosion, her eyes shone back at the sun-bleached scabby crust of the riverbed. The segmented texture of the dry soil resembled the cracks and lines of her dried skin around her eyes, where tears had run rivulets down her face and crusted.”*



C9- Tragic Death (loss) of The Plaintiff's Niece.

The worst of all is, *Neva- Leader of the Tribe's POV*, which is alleged to have been taken to build Ambessa and Mel's storylines and characters as well as the "Blood, Sweat & Tears" music video, is written about the tragic death (loss) of the Plaintiff's niece when she was 3.5 years old. She was half Ugandan. The lost child which the young Ambessa is searching for in the higher consciousness in the music video, is a direct reference to the loss of the Plaintiff's niece. This is why this POV is called African Child.

Moreover, during tragic events, it is common to use softer, less triggering words and phrases to soften the trauma and to prevent triggering. This is why we say, sorry for your loss, instead of sorry that your baby was shot in the head with an arrow, which is what happened to both Sabella and Mel inside their respective mothers, Neva and Ambessa. This is why it is hinted with symbolism and foreshadowing, in Bloodborg, but they say, stillborn. Neva knows, but it's easier to pretend than to face traumatic events.

Example 8 -Tragic Death (loss) of my Niece.

Arcane: Season 2 | "Blood, Sweat & Tears" | Music Video | Netflix

Rebirth after losing a child!

This is sick, because this scene is deeply personal to me and my family.

This too is stolen from **Bloodborg: The Harvest by M.W. Wolf**. The semi-psychedelic dream like sequence is **Neva** in a drug induced sleep realm searching the higher consciousness for her daughter **Sabella**.



The worst of all is **Neva- Leader of the Tribe's POV**, which was taken to build Ambessa and Mel's storylines and characters as well as the "Blood, Sweat & Tears" music video. **Neva- Leader of the Tribe's POV** is written about the tragic death (loss) of my niece when she was 3.5 years old. She was half Ugandan. The lost child which the young Ambessa is searching for in the higher consciousness in the music video, is a direct reference to the loss of my niece. This is why this POV is called African Child.

I wrote in Bloodborg:

'She's not up there, Sabella isn't inside Mother Gaia, I've searched the higher consciousness day and night for two weeks. I've searched everywhere for her.'

'Perhaps she isn't ready to be contacted.'

'Or perhaps she is reborn inside of some great animal, a bird or perhaps inside Lula.'



When Innocence dies, a wolf is reborn. None of this came from your weak link. He is playing with fire and will get burnt.

C10- Aesthetics and worldbuilding

BB- “The horizon warmed with orange and red, As Neva was greeted at the village gates by two lines of warriors. An Elder held out a sharp down-pointing beak of a vulture. Neva pressed the point of the beak into the exposed chest of the warriors she had selected to dance for her.”

BB- “As the warrior’s danced around the village fire, Neva looked out across the rich orange horizon and imagined what it would have been like in the epoch of giraffes and elephants. Skeletons of trees pierced the dead earth, and human bones littered the land, reminding Neva that Mother Gaia was approaching her end-stage.”

“A warrior kicked the embers braking Neva’s reverie.”

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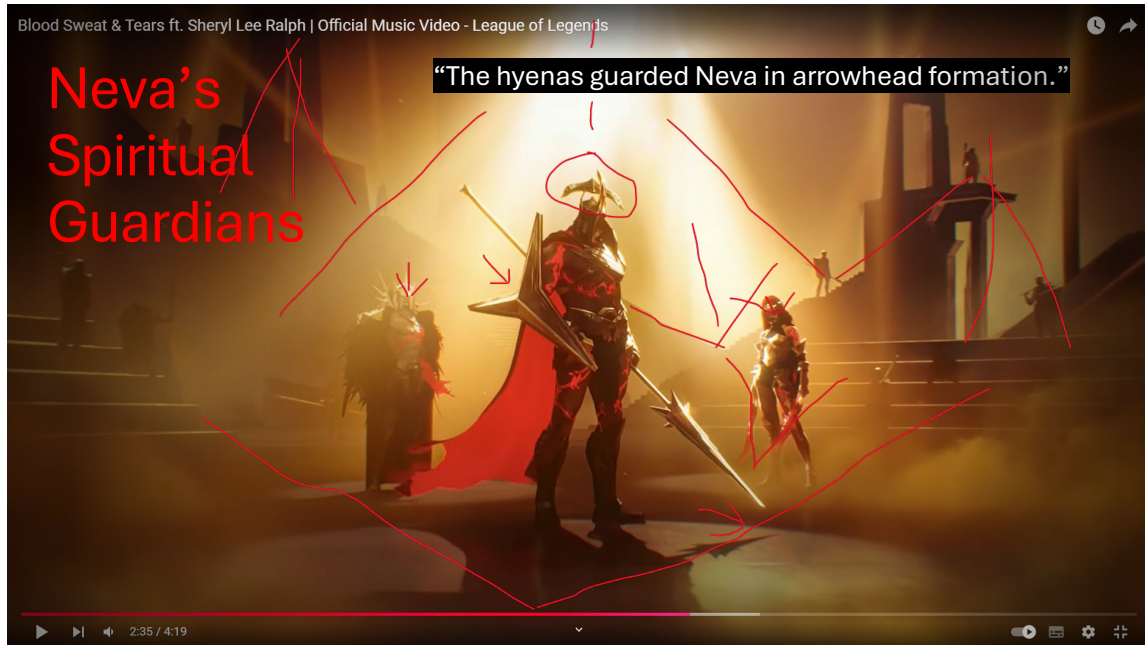
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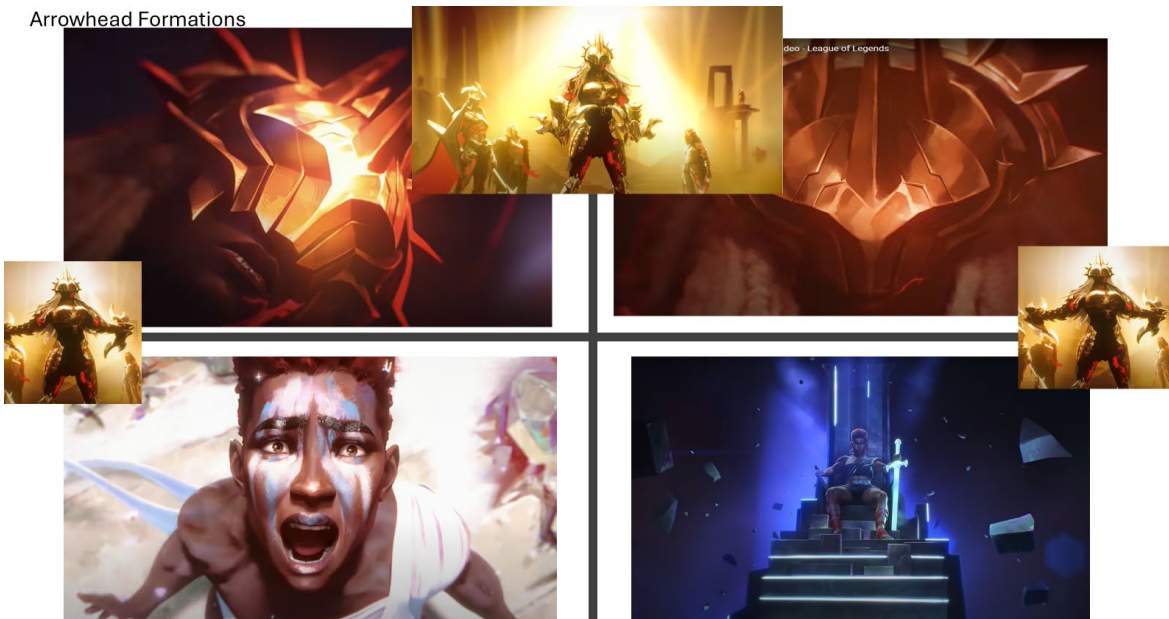
C11- Neva's Spiritual Guardians and Arrowhead Formation.

Bloodborg-

BB- "The hyenas guarded Neva in arrowhead formation."



Arrowhead Formations



C12- Three Hyenas & Two Warriors

BB- 'Chieftain, do you want to see them dance once more,' said Elder Regua, bowing in front of Neva.

BB- 'No, I've seen enough. I choose only two. Warrior T'agon and Warrior

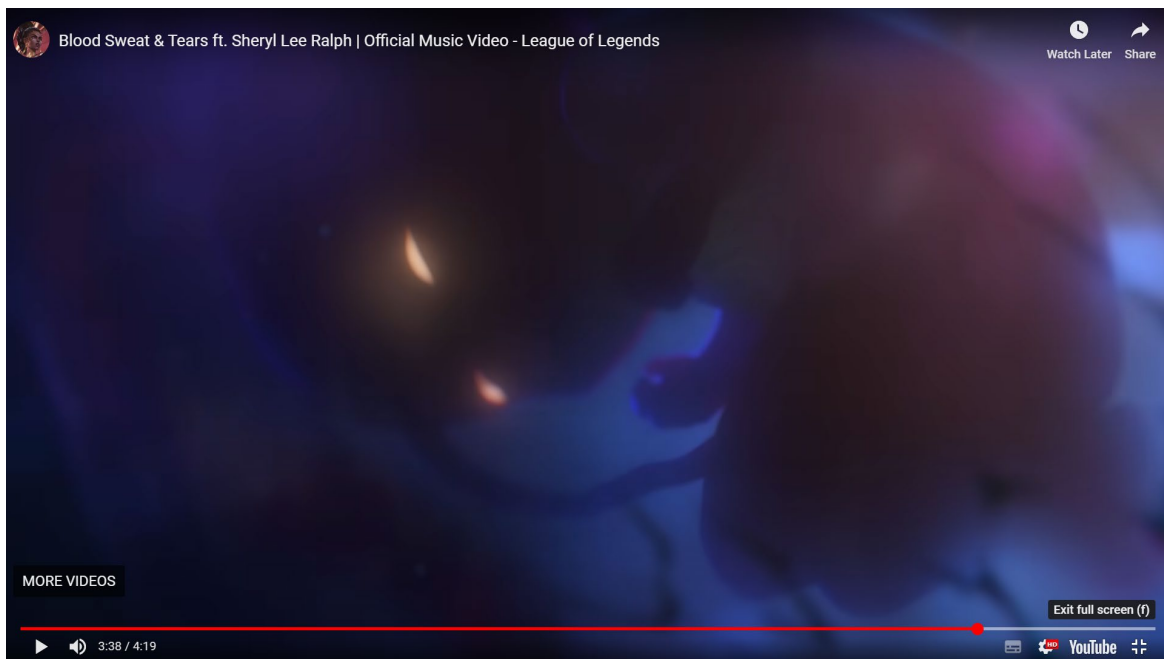
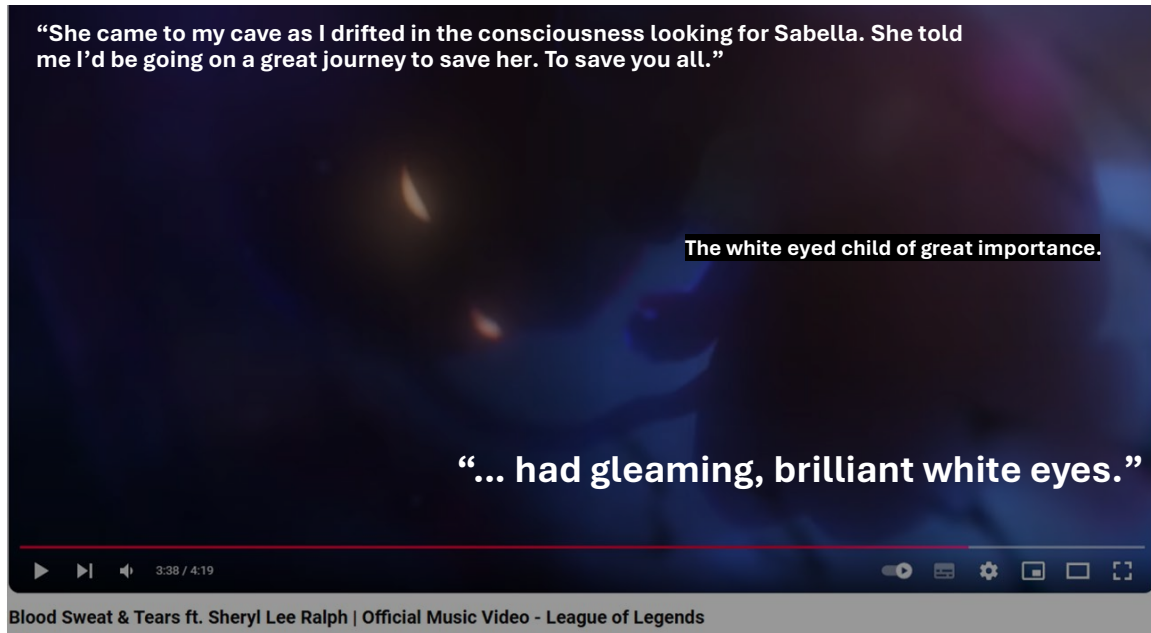
'Chieftain, do you want to see them dance once more,' said Elder Regua, bowing in front of Neva.

'No, I've seen enough. I choose only two. Warrior T'agon and Warrior



C13- The white eyed child of great importance.

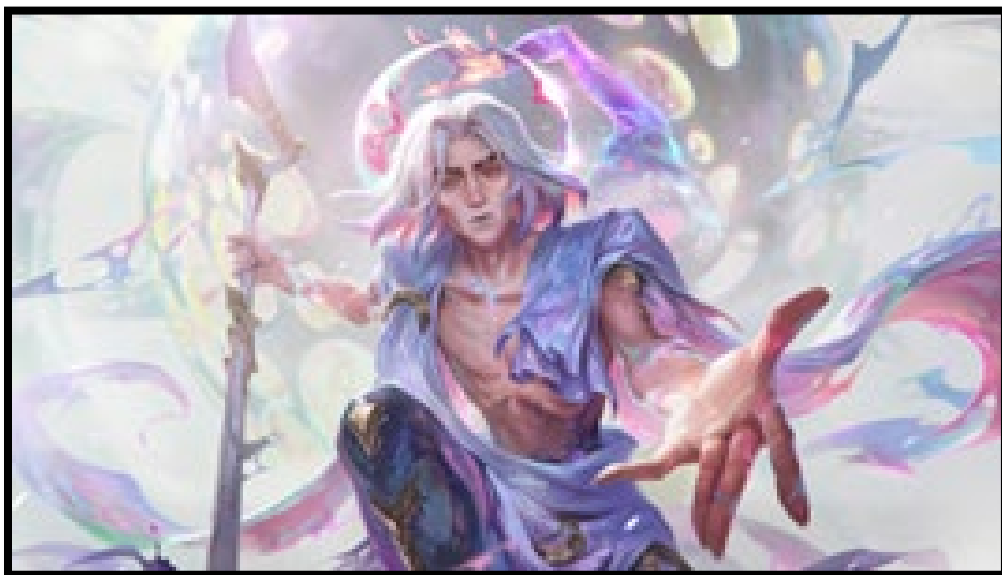
Bloodborg- “Inside the trunk was a new-born baby boy, with the same geometric tribal markings as the woman and gleaming, brilliant white eyes.”



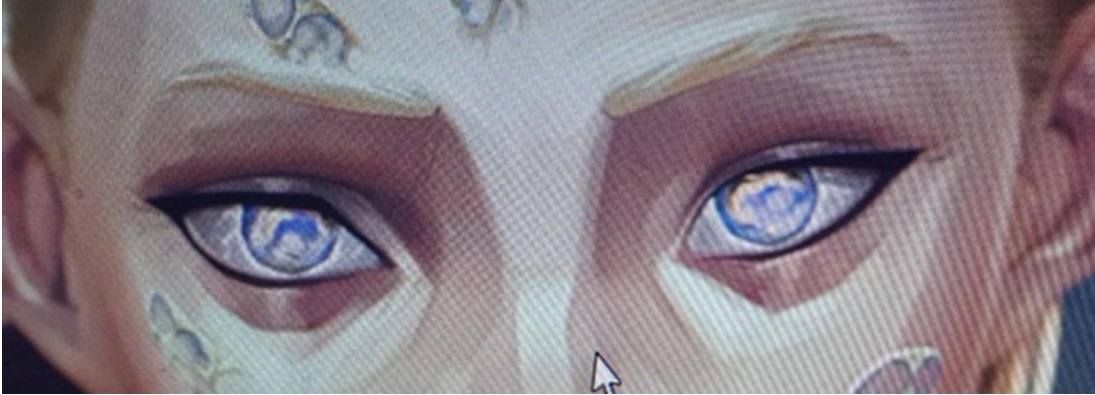
D- Savior Viktor, his White-Eyed Followers and the Higher Consciousness.

D1. Savior Viktor-

For reference, this is the Savior Viktor, a Jesus like “Harald” with white hair.



D2- The white-eyed Mind Controlled disciples and planets inside their eyes
(Councilor Salo)



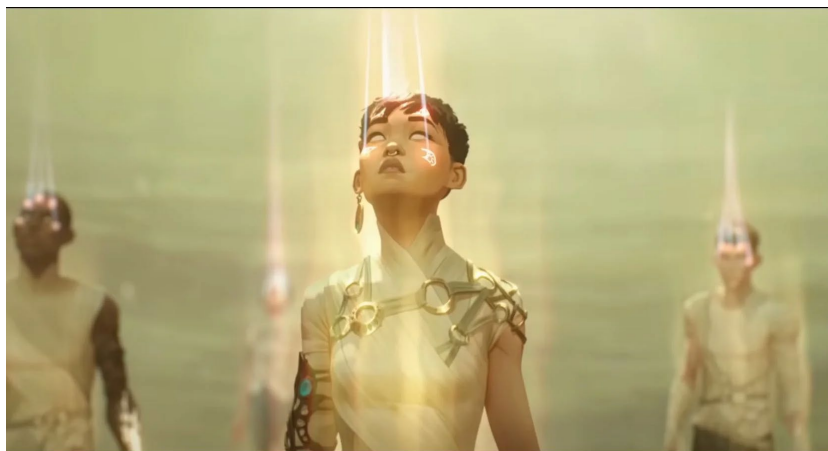
BB- “They also held ocean planets inside their eyes.”

**BB- “...they would gain vitality and be saved in the afterlife by the power of
the worlds inside the eyeballs.”**

**BB - “... with the same geometric tribal markings as the woman. The boy
had gleaming, brilliant white eyes.”**

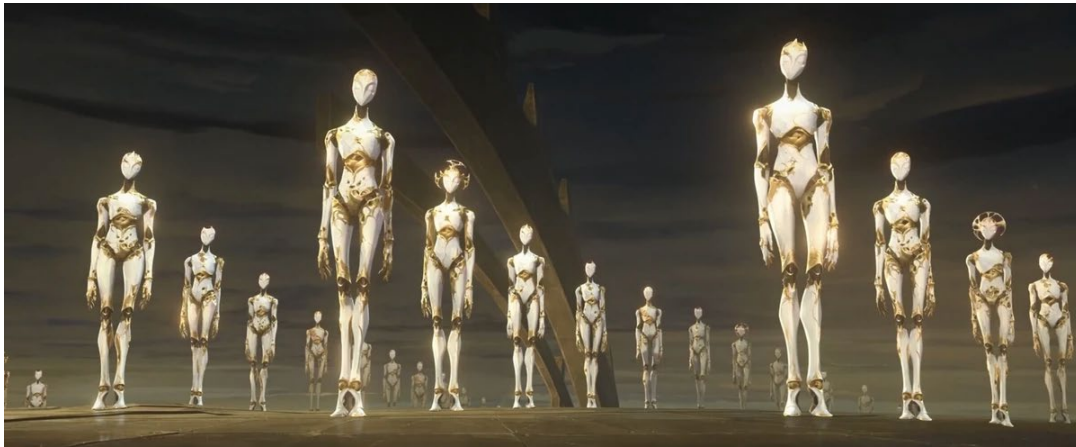
BB- “...old black guy with white eyes.”

D3- Viktor's white-eyed followers.



D4- Arcane Viktor Robots

Bloodborg God Viktor, via his egg (D’borg’s egg Bloodborg) and via the higher consciousness, turned his cult followers into an army of white and gold slave robots.



From Bloodborg -

BB- “The Founding Families are moving towards a world without resistance, a one-world slave machine where the only survivors see them as gods. They plan to re-house their minds in bloodborgs, the pinnacle of all creation. The ultimate cybernetic human beings. Merging AI, in-brain, robotics and synthetic human self-regenerating tissue with the perfect cocktail of endless blood to be immune to all diseases and ageing.”

1 **CONCLUSION**

2 The evidence provided demonstrates a pattern of significant thematic, narrative,
3 and visual parallels between Bloodborg and Riot Games' Arcane and its associated projects. The
4 Plaintiff has highlighted specific instances of alleged infringement, including but not limited to:
5

- 6
- 7 1. The maternal and spiritual narratives in Bloodborg as embodied by Neva,
8 which are mirrored in the characters of Ambessa and Mel Medarda, including
9 Mel's role as the "white-eyed child" of great importance and savior.
10
 - 11 2. The detailed use of the higher consciousness, a narrative and symbolic
12 function central to Bloodborg, which is replicated in Viktor's transformative
13 journey and his white-eyed followers in Arcane.
14
 - 15 3. The recurring use of tribal rituals, warrior iconography, dystopian survival
16 themes, and the motif of white-eyed saviors as representations of divine
17 purpose or salvation in both works.
18
 - 19 4. The imagery, including spiritual guardians, arrowhead formations, and
20 symbolic landscapes and symbolic animals such as vultures, skeletal trees, and
21 ritualistic fire dances, that crosses over from Bloodborg into Arcane and the
22 Blood, Sweat, and Tears music video.
23
24
25
26
27
28

1 5. Specific storylines, such as Neva’s quest to save the world through Gaia’s
2 higher consciousness and Viktor’s Jesus-like transformation, share not only
3 conceptual but also structural similarities.
4

5
6 6. The Plaintiff’s unique trauma-inspired narrative, derived from deeply personal
7 experiences, is a hallmark of his work and is reflected in Bloodborg. The
8 alleged borrowing of this narrative for Arcane and its extensions has caused
9 emotional distress beyond the scope of mere copyright infringement.
10

11
12 The cumulative weight of these similarities cannot be dismissed as coincidence.
13 The replication of complex character arcs, specific symbolic motifs, spiritual and narrative
14 functions, and even visual elements from Bloodborg in Arcane establishes a clear line of
15 influence, if not outright copying. This pervasive overlap demonstrates not just a case of
16 thematic borrowing but a systemic lifting of core elements from Bloodborg to shape key aspects
17 of Arcane, its spin-offs, and related multimedia projects.
18

19
20 The Plaintiff respectfully requests that the Court admit the evidence submitted in
21 Exhibits A, B, C, and D as material to this case, as they clearly substantiate the Plaintiff’s claim
22 that Bloodborg served as an uncredited and unauthorized source for Arcane and its associated
23 properties.
24

Declaration

I, Marc Wolstenholme, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief. I submit this declaration in support of my PLAINTIFF'S MOTION IN LIMINE TO ADMIT EVIDENCE, providing a detailed comparison of the alleged infringement of my original work, Bloodborg, by Riot Games, Inc.

1 The Plaintiff, Marc Wolstenholme, M.W.

2 Wolf. Date: JANUARY 29, 2025

3 Signed: *M. WOLSTENHOLME.*
4